



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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JUL 26 2006

Ref: EPR-N

Mr. Walter C. Waidehlich, Jr.
Federal Highway Administration
2520 West 4700 South, Suite 9A
Salt Lake City, UT 84118

Mr. Brent Jensen
Director, Environmental Services
Utah Department of Transportation
166 W. Southwell Street
Ogden, UT 84404

RE: Comments on SR-26 (Riverdale Road) from
1900 West to Washington Boulevard DEIS (Ogden
and Weber Counties, Utah)
CEQ# 20060283

Dear Messrs. Waidehlich and Jensen:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the Environmental Protection Agency (EPA) Region 8 office is providing comments on the Draft Environmental Impact Statement (EIS) for the proposed improvements to SR-26 (Riverdale Road) From 1900 West to Washington Boulevard, located in Roy, Riverton, South Ogden, and Ogden and Weber Counties, Utah. The proposed action is to reduce congestion, attain a peak hour level of service (LOS) D or better in the year 2030, and make safety improvements to this 3.7 mile stretch of SR-26.

Five alternatives plus the no-action alternative were considered. They are: Increased bus service; Transportation system management (TSM)/Transportation Demand Management (TDM); Lane addition (with five different alignments), Light rail; and Riverdale Road expressway. One alternative provided an LOS D or better and met safety and constructability requirements – the lane addition alternative. Between the five sub-options for the lane Addition alternative, UDOT and FHWA selected Alternative E as the preferred alternative.

We wish to commend UDOT and FHWA on a very good discussion of the affected environment. The information laid out for the reader was clear and concise, and the maps and pictures are excellent tools for understanding the existing environment (e.g., the Weber River Watershed Management Unit map, Figure 3.10 and the water rights points of diversion, Figure 3.12). We have several comments on the document.

Air quality

PM10 and PM2.5

The issue of PM10 was noted in the document and data for a PM10 monitor a half-mile from the project was valuable. However, as was noted, PM10 emissions are expected to increase with traffic thus creating possible hotspots for PM10. While this project is not likely to cause the region to exceed the PM10 standards, local, microscale hotspots could create an unhealthy condition for any residents or businesses near busy intersections. EPA recommends that mitigation relating to sanding and sweeping policies in the winter be considered to avoid increasing PM10 emissions.

While this area is not a PM2.5 nonattainment area, some areas in northern Utah have experienced PM2.5 pollution problems. It would be valuable to include any existing PM2.5 monitoring data or other analysis of this criteria pollutant.

Mobile Source Air Toxics

Regarding language on page 3.9 and in Section 4.7.4: It is EPA's opinion that accurate and reliable estimates of actual human health or environmental impacts from transportation projects and mobile-source air toxics (MSAT) are scientifically possible at this time. An MSAT analysis is not called for on this project. However, it is important to note that there are a number of assertions and statements regarding MSATs in the document with which EPA strongly disagrees. In general it is EPA's position that the scientific and health communities have broad agreement on the toxicity and adverse health impacts associated with even short exposures to many MSATs as well as the increased risk of cancer for chronic exposure. In addition, there are a number of validated methods that can be used to perform a risk assessment of MSATs. FHWA HQ is aware of EPA's concerns and disagreements with the language currently being used in many environmental documents for FHWA. If you would like to discuss the specific language on this with us, please call.

Alternatives

The document states that some of the TDM/TSM ideas are carried through to the preferred alternative. It appears that turn lanes, signal modifications and increased bus service has been included. These are presumably good additions to the preferred alternative, but they do not go very far in terms of TDM/TSM ideas. We do understand that this is a small project, and these ideas may not be suited for this project, but in the future, we hope that TDM/TSM options are expanded well beyond what is included in this document. A TDM/TSM alternative should include incentives for car pooling/van pooling; increased density of housing around an industrial/jobs center; flextime/alternate work schedules in the corridor; bicycle and pedestrian encouragement, and many other more innovative approaches to reducing travel demand or increasing options. We refer you to the Victoria Transport Policy Institute web site for their online TDM encyclopedia for future projects, one of the best web sites we have seen for this topic. www.vtpi.org/tdm.

Based on the procedures EPA uses to evaluate potential environmental impacts of proposed actions and the adequacy of information presented, the EPA is rating the preferred alternative, land addition alternative E, as LO -1 (lack of objections, Adequate). The LO rating indicates that EPA's review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review has disclosed some opportunity for mitigation measures, but these measures do not require changes to the project. The 1 rating indicates that the draft EIS adequately sets forth the environmental impacts of the alternatives. We believe that the document overall is well done in its presentation of information. We have enclosed a summary of EPA's rating criteria and definitions.

If you have any questions on these comments, please contact Deborah Lebow of my staff at 303 312-6223. We again commend UDOT and FHWA for a good document, and look forward to working with you on these issues, particularly the mobile source air toxics issues, in the future.

Sincerely,

A handwritten signature in black ink, appearing to read "Larry Svoboda", with a stylized, flowing script.

Larry Svoboda
Director NEPA Program
Ecosystems Protection and Remediation

